

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant.</i>)	
_____)	

**GOVERNMENT’S MOTION TO SEAL REPLY TO DEFENDANT’S RESPONSE TO
MOTION FOR ORDER TO SHOW CAUSE AND TO SEAL**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal an un-redacted copy of the government’s reply to the defendant’s response to the government’s motion for an order to show cause and to seal. A redacted copy of the reply has been filed on the public docket. Dkt. No. 190. The un-redacted copy will be delivered to the clerk’s office with a copy of this motion and provided to defense counsel. A proposed Order is attached for the consideration of the Court.

Through the Protective Order [Dkt. No. 28], the parties have agreed that certain information related to this investigation and prosecution should be filed under seal. The government’s reply to the defendant’s response to the government’s motion for an order to show cause and to seal contains sensitive law enforcement information and details that, if revealed, could jeopardize this and other law enforcement investigations. Sealing the reply is therefore necessary in order to safeguard this information and protect these investigations. The government has considered alternatives less drastic than sealing and has found that none will suffice.

The Court has supervisory power over its own records and may, in its discretion, seal

